

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF TAYLOR GENERAL
EMPLOYEES RETIREMENT SYSTEM, On
Behalf of Itself and All Others Similarly
Situating,

Plaintiff,

vs.

SANOFI-AVENTIS, et al.,

Defendants.

Civil Action No. 1:07-cv-10279

CLASS ACTION

MOTION TO ADMIT COUNSEL *PRO HAC*
VICE



FEB 11 2008

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FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
FEB 11 11 21 AM '08

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Samuel H. Rudman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission, *pro hac vice*, of:

Tor Gronborg
COUGHLIN STOIA GELLER RUDMAN
& ROBBINS LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Tor Gronborg is a member in good standing of the Bar of the State of California (Certificate of Good Standing attached hereto as Exhibit A), as well as the United States District Courts of the Northern, Central and Southern Districts of California. There are no pending disciplinary proceedings against Tor Gronborg in any State or Federal court.

DATED: February 7, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD



SAMUEL H. RUDMAN

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Attorneys for Plaintiff

EXHIBIT A



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

January 31, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, TOR GRONBORG, #179109 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 1995; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over a horizontal line.

Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CITY OF TAYLOR GENERAL	:	Civil Action No. 1:07-cv-10279
EMPLOYEES RETIREMENT SYSTEM, On	:	
Behalf of Itself and All Others Similarly	:	<u>CLASS ACTION</u>
Situated,	:	
	:	AFFIDAVIT OF SAMUEL H. RUDMAN IN
Plaintiff,	:	SUPPORT OF MOTION TO ADMIT
	:	COUNSEL <i>PRO HAC VICE</i>
vs.	:	
	:	
SANOFI-AVENTIS, et al.,	:	
	:	
Defendants.	:	
<hr/>		x

SAMUEL H. RUDMAN, being duly sworn, deposes and says as follows:

1. I am a member of Coughlin Stoia Geller Rudman & Robbins LLP, Lead Counsel for plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Tor Gronborg as counsel, *pro hac vice*, to represent plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in May 1993. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Gronborg is a member of Coughlin Stoia Geller Rudman & Robbins LLP, in San Diego, California.

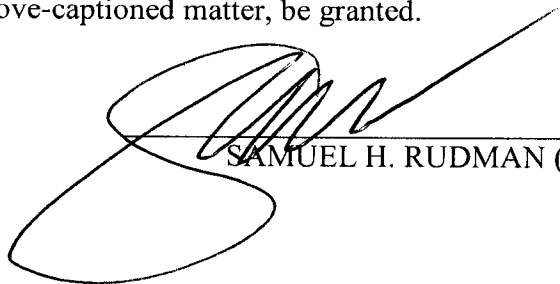
4. I have found Mr. Gronborg to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am placed to move for the admission of Tor Gronborg, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Tor Gronborg, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Tor Gronborg, *pro hac vice*, to represent plaintiff in the above-captioned matter, be granted.

DATED: February 7, 2008




SAMUEL H. RUDMAN (SR-7957)

CERTIFICATE OF SERVICE

I, Kelly Stadelmann, hereby certify that on February 8, 2008, I caused a true and correct copy of the attached:

Motion For Admission *Pro Hac Vice*, and Supporting Papers
to be served by United States mail to all counsel listed on the attached service list.


Kelly Stadelmann

SANOFI-AVENTIS

Service List - 1/29/2008 (07-0246)

Page 1 of 1

Counsel For Defendant(s)

Legal Department
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174, avenue de France
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EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	x	
CITY OF TAYLOR GENERAL	:	Civil Action No. 1:07-cv-10279
EMPLOYEES RETIREMENT SYSTEM, On	:	
Behalf of Itself and All Others Similarly	:	<u>CLASS ACTION</u>
Situated,	:	
	:	[PROPOSED] ORDER FOR ADMISSION
Plaintiff,	:	<i>PRO HAC VICE</i> ON WRITTEN MOTION
	:	
vs.	:	
	:	
SANOFI-AVENTIS, et al.,	:	
	:	
Defendants.	:	
	x	

Upon the motion of Samuel H. Rudman, attorney for plaintiff City of Edinburgh Council on Behalf of the Lothian Pension Fund and New England Carpenters Guaranteed Annuity Fund, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Tor Gronborg
COUGHLIN STOIA GELLER RUDMAN
& ROBBINS LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
E-mail: Torg@csgrr.com

is admitted to practice, *pro hac vice*, as counsel for plaintiff City of Edinburgh Council on Behalf of the Lothian Pension Fund and New England Carpenters Guaranteed Annuity Fund in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

DATED: February __, 2008

THE HONORABLE GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Samuel H. Rudman, hereby certify that on February 7, 2008, I caused a true and correct copy of the attached:

Motion to Admit Counsel *Pro Hac Vice*; and

Affidavit of Samuel H. Rudman in Support of Motion to Admit Counsel *Pro Hac Vice*,

to be: (i) filed by hand with the Clerk of the Court; and (ii) served by first-class mail to all counsel on the attached service list.

/s/ Samuel H. Rudman

Samuel H. Rudman

SANOFI-AVENTIS

Service List - 1/29/2008 (07-0246)

Page 1 of 1

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